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November 1, 2006

VIA EMAIL AND US MAIL

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VIA US MAIL

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 – 112th Street S.W.
Washington, D.C. 20554

**Re: CC Docket 96-45, Federal State Joint Board on Universal Service
Dobson Cellular Systems of Alaska, LLC
SPIN 143030621; SAC 619004**

Dear Ms. Majcher and Ms. Dortch:

By Order dated August 16, 2006, the Regulatory Commission of Alaska (“RCA”) granted the joint motion of Dobson Cellular Systems, Inc. and Dobson Cellular Systems of Alaska, LLC (collectively “Dobson”) to designate Dobson Cellular Systems of Alaska, LLC as a competitive eligible telecommunications carrier (“ETC”) in lieu of Dobson Cellular Systems, Inc. throughout Dobson’s designated service areas in the State of Alaska (SAC 619004). A copy of the RCA’s August 16 Order is enclosed as **Exhibit A**.

As set forth in the RCA’s August 16 Order, the RCA further required Dobson to file notice with the RCA upon completion of its corporate reorganization. Dobson completed the corporate reorganization effective September 29, 2006. Pursuant to the reorganization, Dobson Cellular Systems of Alaska, LLC has commenced service and assumed Dobson Cellular Systems, Inc.’s obligations as a competitive ETC throughout the designated service areas set forth in ordering paragraph 3 of the RCA’s August 16 Order (Exhibit A, pp. 6-7). Dobson filed

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notice of the completion of its corporate reorganization with the RCA on October 6, 2006. A copy of Dobson's October 6 notice is enclosed as **Exhibit B**.

Consistent with the RCA's August 16 Order, the RCA has further certified Dobson Cellular Systems of Alaska, LLC's use of high cost support pursuant to 47 C.F.R. §§ 54.313 and 54.314.

Accordingly, please update your records to reflect that Dobson Cellular Systems of Alaska, LLC (SPIN 143030621) is the designated ETC for Alaska SAC 619004 effective September 29, 2006.

If you have any questions or concerns regarding the enclosed, please do not hesitate to contact me at the above number.

Very truly yours,



Matthew A. Slaven
(612) 977-8245
mslaven@briggs.com

MAS/lzd
Enclosures

cc: Michael Spead, USAC (via email mspead@universalservice.org)
Alaska Regulatory Commission (via US Mail)
Thomas A. Coates (via US Mail)
Phillip J. Giachino (via US Mail)
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STATE OF ALASKA

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

Kate Giard, Chairman
Dave Harbour
Mark K. Johnson
Anthony A. Price
Janis W. Wilson

In the Matter of the Application of DOBSON)
CELLULAR SYSTEMS, INC. for Designation as)
a Carrier Eligible to Receive Federal Universal)
Service Support under the Telecommunications)
Act of 1996)

U-05-41

ORDER NO. 3

**ORDER REOPENING DOCKET, GRANTING TRANSFER OF ELIGIBLE
TELECOMMUNICATIONS CARRIER STATUS SUBJECT TO
CONDITIONS, AND REQUIRING FILING**

BY THE COMMISSION:

Summary

We grant, in part, the Joint Motion filed by Dobson¹ and Dobson Alaska² to reopen Docket U-05-41. We designate Dobson Alaska as an eligible telecommunications carrier (ETC) in lieu of Dobson subject to conditions. We require Dobson Alaska to notify us when the transfer between Dobson and Dobson Alaska is concluded.

Background

Dobson and Dobson Alaska (the parties) jointly moved to reopen Docket U-05-41. The parties requested that we amend Order U-05-41(1) to designate Dobson Alaska as an ETC in lieu of Dobson and that we certify Dobson Alaska's use of

¹Dobson Cellular Systems, Inc. (Dobson).

²Dobson Cellular Systems of Alaska, LLC (Dobson Alaska).

1 federal universal service funds for 2006 to the FCC and USAC.³ The parties filed
2 documentation certifying Dobson Alaska's use of federal universal service funding for
3 2006.⁴

4 We noticed the Joint Motion on June 9, 2006, with a comment filing
5 deadline of June 23, 2006. Alaska Telephone Company (ATC)⁵ and Copper Valley
6 Telephone Company⁶ filed notices of non-opposition to the Joint Motion.

7 Discussion

8 We approved Dobson's application for designation as an ETC carrier for
9 the purposes of receiving federal universal service support under the
10 Telecommunications Act of 1996⁷ for certain service areas in Alaska.⁸

11 The parties stated that Dobson Alaska is a new business entity and
12 wholly-owned subsidiary of Dobson and that Dobson Alaska is created solely for the
13 purpose of owning and operating the assets and operations of Dobson in Alaska.⁹
14 Under an internal corporate reorganization plan, Dobson will transfer all of its Alaska
15 assets, properties, rights, and obligations, including network facilities, switches, FCC
16 licenses, customer contracts, customers, and interconnection arrangements to Dobson
17 Alaska. Dobson Alaska will continue to provide the same services to all Alaska

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³*Joint Motion to Reopen Docket for Limited Purpose and Request for Issuance of*
19 *Amended Order and Certification* (Joint Motion), filed May 5, 2006.

20 ⁴Joint Motion, App. A.

21 ⁵*Alaska Telephone Company's Non-opposition to Joint Motion*, filed May 9, 2006.

22 ⁶*Copper Valley Telephone Cooperative, Inc.'s Non-opposition to Joint Motion*,
filed May 11, 2006.

23 ⁷The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996)
24 amending the Communications Act of 1934, 47 U.S.C. §§ 151 *et seq.*

25 ⁸Order U-05-41(1), *Order Affirming Electronic Ruling, Approving Application for*
Eligible for Telecommunications Carrier Status and Requiring Filings, dated
26 January 25, 2006.

⁹Joint Motion at 3-4.

1 business systems as Dobson. The parties said that the reorganization and transfer of
2 assets from Dobson to Dobson Alaska will not result in any change in ownership,
3 management, or control. The ultimate ownership, operation, and management of the
4 Alaska operations will remain with Dobson.

5 The parties asserted that the reorganization will improve control and
6 monitoring of Dobson's operations and ETC obligations in Alaska. The parties stated
7 that the closing of the intercompany transfer of Alaska assets from Dobson to Dobson
8 Alaska has not yet been finalized and is contingent upon our granting the Joint Motion.
9 The parties stated that we would be notified upon completion of the reorganization.

10 Request for Transfer of ETC Status

11 The parties requested that we transfer Dobson's ETC designation to
12 Dobson Alaska throughout the same designated service areas and subject to the same
13 ETC obligations as Dobson. The parties asserted that the transfer of ETC designation
14 to Dobson Alaska would eliminate disruption in universal service funding for the
15 designated service areas and would avoid any gap in performing the obligations of an
16 ETC.

17 The parties stated that Dobson Alaska has committed to undertake
18 Dobson's ETC obligations. The parties said that Dobson Alaska will provide the nine
19 supported services using the same network facilities and licenses currently used by
20 Dobson.¹⁰ The parties also stated that Dobson Alaska will meet the minimum
21 advertising requirements to ensure appropriate and sufficient customer notification of its
22 ETC services. The parties asserted that Dobson Alaska will meet the ETC obligation to
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26 ¹⁰Joint Motion at 4.

1 provide the supported services throughout the designated services areas upon
2 reasonable service request and will extend service pursuant to the seven-step plan
3 approved by the commission in Order U-05-41(1) when it designated Dobson as an
4 ETC. The parties also said that Dobson Alaska will report to the commission if it cannot
5 provide service upon reasonable request without construction of a new cell site. The
6 parties further stated that Dobson Alaska will assume the build-out and service
7 improvement plan submitted by Dobson in Docket U-05-41. Dobson Alaska will
8 participate in the annual certification process established by the commission.

9 The parties also stated that the transfer of ETC designation and
10 operations from Dobson to Dobson Alaska will have no impact on the public interest
11 because the unique advantages of Dobson's current services, including mobility, greater
12 customer choice, and larger local calling areas, will remain the same.¹¹ The parties
13 further stated that the transfer of ETC designation will not result in any change in the
14 amount of universal service funding received for the designated service areas and in the
15 ETC commitments and obligations undertaken by Dobson.

16 In the past, we have allowed the transfer of ETC designation from one
17 entity to another. We transferred the ETC designation of GTE Alaska Incorporated
18 (GTEA) to ATEAC, Inc. (ATEAC) when ATEAC purchased GTEA's assets. We
19 determined that it was appropriate to transfer GTEA's ETC status and ETC obligations
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26 ¹¹Joint Motion at 5.

1 to ATEAC, and eventually to the individual companies, to eliminate any disruption in
2 universal service funding for the service areas to be transferred.¹²

3 We also transferred the ETC designation and obligation granted to MTA
4 Wireless (MTAW) by Order U-03-86(3)¹³ to MTA Communications, Inc. d/b/a MTA
5 Wireless (MTAC)¹⁴ when MTAW was merged into MTAC.

6 We believe that the motion to transfer Dobson's ETC designation to
7 Dobson Alaska is reasonable, and we grant the Joint Motion, in part. We designate
8 Dobson Alaska as an ETC in lieu of Dobson, subject to the following conditions:

- 9 • Dobson Alaska shall undertake the ETC obligations and commitments that
10 currently apply to Dobson in regards to its ETC designation.
- 11 • The transfer of ETC designation and obligations from Dobson to Dobson Alaska
12 shall be effective upon the completion of the reorganization and transfer of
13 Dobson's Alaska assets, properties, rights, and obligations, including network
14 facilities, switches, FCC licenses, customer contracts, customers, and
15 interconnection arrangements to Dobson Alaska.

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18 ¹²Order U-99-107(5), *Order Accepting Stipulation, Subject to Conditions; and*
19 *Requiring Filing*, dated July 11, 2000. Docket U-99-107 is titled *In the Matter of the*
20 *Joint Application of GTE ALASKA INCORPORATED and ATEAC, INC. to Transfer*
21 *Certificate of Public Convenience and Necessity No. 3, Authorizing Provision of*
22 *Telecommunications (Local Exchange) Public Utility Service, From GTE ALASKA*
23 *INCORPORATED to ATEAC, INC.* See also Orders U-99-119(4), U-99-120(4),
24 U-99-121(4), U-99-122(4), and U-99-123(4), designating ETC status to Alaska
25 Telephone Company; Arctic Slope Telephone Association Cooperative, Inc.; TelAlaska,
26 Incorporated d/b/a Mukluk Telephone Company, Inc. and Interior Telephone Company;
and United-KUC, Inc.

¹³Order U-03-86(3), *Order Approving Application for ETC Status, Requiring*
Filing, and Closing Docket, dated December 8, 2004.

¹⁴Order U-04-115(1), *Order Recognizing Affiliate Merger, Amending Certificate,*
Addressing Issues and Closing Docket, dated January 21, 2005.

1 Request for Certification Letter

2 We submitted a letter to the Federal Communications Commission (FCC)
3 and to the federal universal Universal Service Administrative Company (USAC)
4 certifying Dobson's use of service funds for 2006.¹⁵ The parties requested that we
5 certify to the FCC and USAC Dobson Alaska's use of federal universal service funds for
6 2006.¹⁶

7 We require Dobson Alaska to notify us within ten (10) days after the
8 closing of the intercompany transfer of Alaska assets from Dobson to Dobson Alaska.
9 We will certify Dobson Alaska for its use of universal service funds to the FCC and
10 USAC after we are notified of the completion of the transaction.

11 ORDER

12 THE COMMISSION FURTHER ORDERS:

- 13 1. Docket U-05-41 is reopened.
- 14 2. The joint motion by Dobson Cellular Systems, Inc. and Dobson Cellular
15 Systems of Alaska, LLC filed on May 5, 2006, is granted, in part, as further explained in
16 the body of this order.
- 17 3. The designation of Dobson Cellular Systems, Inc. as an eligible
18 telecommunications carrier eligible to receive federal universal service support under
19 the Telecommunications Act of 1996 in the study areas of ACS of Alaska, Inc. d/b/a
20 Alaska Communications Systems, ACS Local Service, and ACS for its Greatland study
21 area; ACS of Alaska, Inc. d/b/a Alaska Communications Systems, ACS Local Service,
22 and ACS for its Juneau study area; ACS of Anchorage, Inc. d/b/a Alaska

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24 ¹⁵Order U-06-19, *Order Granting Certification Request and Closing Docket*, dated
25 April 26, 2006. Docket U-06-19 is titled *In the Matter of the Request by Dobson Cellular
Systems, Inc. for Certification of the Company's Use of Federal High-Cost Universal
Service Support for Calendar Year 2006*.

26 ¹⁶*Request for Expedited Consideration*, filed February 28, 2006.

1 Communications Systems, ACS Local Service, and ACS, ACS of Fairbanks, Inc. d/b/a
2 Alaska Communications Systems, ACS Local Service, and ACS; ACS of the Northland,
3 Inc. d/b/a Alaska Communications Systems, ACS Local Service, and ACS for its Glacier
4 State study area; Alaska Telephone Company; Copper Valley Telephone Cooperative,
5 Inc.; City of Ketchikan; and Matanuska Telephone Association, Inc., is transferred to
6 Dobson Cellular Systems of Alaska, LLC, subject to conditions as discussed in the body
7 of this order and shall become effective upon the completion of the transfer as
8 explained in the body of this order.

9 4. Dobson Cellular Systems of Alaska, LLC shall notify us within ten days
10 after the closing of the intercompany transfer of Alaska assets from Dobson Cellular
11 Systems, Inc. to Dobson Cellular of Alaska, LLC as discussed in the body of this order.

12 DATED AND EFFECTIVE at Anchorage, Alaska, this 16th day of August, 2006.

13 BY DIRECTION OF THE COMMISSION
14 (Commissioners Dave Harbour and Janis W. Wilson,
15 not participating.)
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STATE OF ALASKA

BEFORE THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

Kate Giard, Chair
Dave Harbour
Mark K. Johnson
Anthony A Price
Janis W. Wilson

In the Matter of the Application of)
DOBSON CELLULAR SYSTEMS, INC.)
for Designation as a Carrier Eligible to)
Receive Federal Universal Service Support)
under the Telecommunications Act of 1996)

U-05-041

**NOTICE OF COMPLETION OF CORPORATE REORGANIZATION
AND TRANSFER OF ETC DESIGNATION**

1. Dobson Cellular Systems, Inc. ("DCSI") and Dobson Cellular Systems of Alaska, LLC ("Dobson Alaska") hereby give notice that the parties have completed the corporate reorganization summarized in the Commission's Order U-05-41(3) dated August 16, 2006.

2. Pursuant to the reorganization, Dobson Alaska has commenced service and has assumed DCSI's obligations as a competitive eligible telecommunications carrier ("ETC") throughout the Company's designated service areas in Alaska effective September 29, 2006.

3. Dobson Alaska has undertaken the ETC obligations and commitments that previously applied to DCSI in regard to its ETC designation.

4. This notice is filed in compliance with Order U-05-41(3).

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3 Dated: October ____, 2006
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Respectfully submitted,

ASHBURN & MASON

By 

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*Counsel for Dobson Cellular Systems, Inc. and
Dobson Cellular Systems of Alaska, LLC*

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VERIFICATION

Thomas A. Coates hereby certifies as follows:

1. I serve as Vice President, Dobson Cellular Systems, Inc., the sole member and manager of Dobson Cellular Systems of Alaska, LLC ("Dobson Alaska").

2. I have reviewed the forgoing Notice of Completion of Corporate Reorganization and Transfer of ETC Designation and the facts stated therein are true and correct to the best of my present knowledge, information and belief.



Thomas A. Coates
Vice President, Dobson Cellular Systems, Inc.,
the Sole Member/Manager of Dobson Cellular
Systems of Alaska, LLC

Subscribed and sworn to before me
this 6th day of October, 2006

(SEAL)

